

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to update the Commission's policies and procedures related to electromagnetic fields emanating from regulated utility facilities.

Rulemaking 04-08-020

**COMMENTS OF THE OFFICE OF RATEPAYER ADVOCATES  
ON THE UTILITIES' EMF FIELD MANAGEMENT PLAN FILINGS**

In accordance with the schedule established at the April 4, 2005, prehearing conference, the Office of Ratepayer Advocates ("ORA") submits these comments on the utilities' May 26, 2005, EMF Field Management Plan filings. ORA recommends that the Commission consider allowing the utilities to have greater flexibility in implementing the four percent cost guideline when the total costs of electromagnetic field ("EMF") mitigation for a particular project or facility are relatively low, and that the Commission require the utilities to provide standardized summary tables of mitigation alternatives.

**I. The Commission Should Consider Allowing Greater Flexibility with Its Four Percent Cost Guideline**

One of the consequences of strictly applying a four percent cost guideline for EMF mitigation is that some relatively low-cost mitigation measures may be foregone, even though the total mitigation cost is quite small. An example of this is Southern California Edison's ("Edison") Valley South-Pauba 115kV Transmission Line Project. According to Edison, the base case project cost is \$2.3 million.<sup>1</sup> Four percent of the base case cost is \$91,320.<sup>2</sup> Edison considered two

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<sup>1</sup> Southern California Edison, EMF Field Management Plan for the Valley South-Pauba 115 kV Transmission Line Project, Valley South to Auld Segment, May 15, 1998, at 12.

low-cost mitigation alternatives: (1) raising pole heights by five feet, which would cost an additional \$173,987, 7.6 percent of the total project cost, resulting in a 16.6 percent EMF reduction under the line sag versus the Base Case; and (2) optimizing the conductor phasing for field cancellation, which would cost \$2,500, 0.11 percent of the total project cost, resulting in a 55 percent EMF reduction.<sup>3</sup> Edison rejected the first alternative as exceeding the four percent guideline and selected the second alternative.<sup>4</sup> Assuming the two alternatives are not mutually exclusive, both could have been selected for a relatively modest \$176,500.

Rigid application of the four percent cost guideline may create some “penny wise and pound foolish” results. Indeed, the Commission has stated that the four percent cost guideline should not be considered an absolute cost cap: “We will not establish 4 percent as an absolute cap at this time because we do not want to arbitrarily eliminate a potential measure that might be available but costs more than the 4 percent figure.”<sup>5</sup> The Commission should consider whether the utilities should have greater flexibility in implementing the four percent cost guideline when total costs are relatively low.

## **II. The Commission Should Require the Utilities to Provide Standardized Summary Tables of EMF Mitigation Alternatives**

The Commission should also consider requiring the utilities to clearly state the EMF mitigation alternatives they are considering for a transmission or substation project, the estimated costs and the reasons for adoption or rejection of the alternatives. In reviewing the utilities’ EMF Field Management Plan filings, ORA was struck by the absence of a common format for presenting mitigation

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<sup>2</sup> Id.

<sup>3</sup> Id. at 16.

<sup>4</sup> Id. at 17.

<sup>5</sup> Re Potential Health Effects of Electric and Magnetic Fields of Utility Facilities, Decision 93-11-013, 52 CPUC2d 1, 9.

alternatives. A standardized table summarizing the estimated costs and reasons for adoption or rejection of the mitigation alternatives would make evaluation much simpler and more transparent.

### **III. CONCLUSION**

For the reasons discussed above, ORA recommends that the Commission consider giving the utilities greater flexibility in applying the four percent cost guideline if total EMF mitigation costs are relatively low, and require utilities to present mitigation alternatives in a standardized format.

Respectfully submitted,

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July 26, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of “**COMMENTS OF THE OFFICE OF RATEPAYERS ADVOCATES ON THE UTILITIES’ EMF FIELD MANAGEMENT PLAN FILINGS**” in **R.04-08-020** by using the following service:

[ X.] **E-Mail Service:** sending the entire document as an attachment to all known parties of record who provided electronic mail addresses.

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Executed on July 26, 2005 at San Francisco, California.

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Halina Marcinkowski

**N O T I C E**

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